

JUDGE KOELTL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA :
 :
v. :
 :
SALATHIEL LUIS MORA, :
 :
Defendant. :
 :
----- x

07 CRIM. 450

INDICTMENT

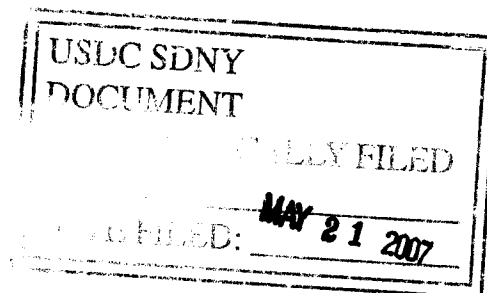
07 Cr.

COUNT ONE

The Grand Jury charges:

1. On or about August 19, 2005, in the Southern District of New York, SALATHIEL LUIS MORA, the defendant, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, approximately 1,102 pills containing a detectable amount of 3, 4-methylenedioxymethamphetamine ("MDMA" or "Ecstasy").

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Section 2.)



COUNT TWO

The Grand Jury further charges:

2. On or about August 19, 2005, in the Southern District of New York, SALATHIEL LUIS MORA, the defendant, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, approximately 978 pills containing a detectable amount of 3, 4-methylenedioxyamphetamine ("MDA").

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

3. As a result of committing one or more of the controlled substance offenses alleged in Counts One and Two of this Indictment, SALATHIEL LUIS MORA, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the violations alleged in Counts One and Two of this Indictment, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the said violations, including but not limited to the following:

a. A sum of money in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offenses alleged in Counts One and Two of this Indictment.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the said defendant:

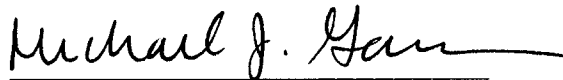
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)



Foreperson



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SALATHIEL LUIS MORA

Defendant.

INDICTMENT

07 Cr.

(Title 21, United States Code, Sections
812, 841(a)(1) and 841(b)(1)(C); Title
18, United States Code, Section 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

5-21-07 Filed Indictment. Case assigned to J. Koeltl.
WI

Pitman.
U.S.M.S.